



Defendant	August 18, 2004 Deposition:  314:18 – 316:4	<u>Objections.</u> Fed. R. Evid. 801. Witness is not unavailable as defined by Fed. R. Evid. 804(a). Testimony is likewise hearsay within hearsay and offered for the truth of the matter asserted.  Fed. R. Evid. 602 – lack of personal knowledge.  <u>Counter-designations.</u> Alverson (6/29/04): 69:2-11; 84:8-85:7
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**2. Robert C. Black**

Offering Party	Designation Range	Objection/Counter Designation
		<u>Objections.</u> Witness is a may-call witness. If witness is not called: Fed. R. Evid. 801. Witness is not unavailable as defined by Fed. R. Evid. 804(a).
Defendant	August 30, 2005 Deposition:  8:14 – 10:22	
Defendant	18:15 – 19:20	
Defendant	20:5 – 20:18	
Defendant	21:15 – 22:18	<u>Counter-designations.</u> Black at 22:19-23:10.
Defendant	26:22 – 27:11	<u>Objections:</u> Fed. R. Evid. 602 – lack of personal knowledge.
Defendant	29:3 – 29:21	<u>Objections.</u> Fed. R. Evid. 602 – lack of personal knowledge.
Defendant	30:12 – 31:15	<u>Objections.</u> Fed. R. Evid.

		602 – lack of personal knowledge.  <u>Counter-designations.</u> Black, 31:16-33:1.
Defendant	33:13 – 34:14	
Defendant	58:6 – 59:9	
Defendant	71:13 – 72:4	<u>Objections.</u> Non-responsive. Fed. R. Evid. 602 – lack of personal knowledge.
Defendant	73:5 – 74:12	
Defendant	84:6 – 85:5	

**3. Sean D. Coakley**

Offering Party	Designation Range	Objection/Counter Designation
		<u>Objections.</u> Fed. R. Evid. 801. Witness is not unavailable as defined by Fed. R. Evid. 804(a).
Defendant	October 25, 2005 Deposition: 59:9 – 59:19	
Defendant	71:13 – 71:16	
Defendant	79:2 – 79:14	

**4. John Freeberry**

Offering Party	Designation Range	Objection/Counter Designation
		<u>Objections.</u> Fed. R. Evid. 801. Witness is not unavailable as defined by Fed. R. Evid. 804(a).
Defendant	May 20, 2004 Deposition:	

	6:9 – 7:5	
Defendant	7:18 – 8:17	
Defendant	24:9 – 26:1	
Defendant	109:1 – 111:22	<u>Objections.</u> Hearsay within hearsay.
Defendant	118:11 – 120:13	<u>Objections.</u> Hearsay within hearsay.

**5. Christopher J. Iacono**

Offering Party	Designation Range	Objection/Counter Designation
		<u>Objections.</u> Fed. R. Evid. 801. Witness is not unavailable as defined by Fed. R. Evid. 804(a).
Defendant	June 9, 2005 Deposition: 5:3 – 4	
Defendant	72:10-20	
Defendant	116:7 – 117:7	<u>Counter-designations.</u> 121:2-12
Defendant	121:22 – 123:2	<u>Counter-designations.</u> 123:3-18
Defendant	153:10 – 155:5	<u>Counter-designations.</u> David R. Brennan (2/14/06), 54:10-55:8; 65:1-12; Patterson (6/28/05), at 115:9-18.
Defendant	170:20 – 172:8	
Defendant	174:3 – 177:16	<u>Objections.</u> Non-responsive.

**6. Lesley A. Lacey**

Offering Party	Designation Range	Objection/Counter Designation
		<u>Objections.</u> Fed. R. Evid.

Offering Party	Designation Range	Objection/Counter Designation
		801. Witness is not unavailable as defined by Fed. R. Evid. 804(a).
Defendant	August 24, 2005 Deposition: 16:10 – 17:2	
Defendant	19:8 – 19:17	.
Defendant	20:6 – 20:8	
Defendant	20:16 – 21:2	
Defendant	30:1 – 30:22	
Defendant	47:9 – 47:13	
Defendant	50:8 – 51:14	
Defendant	65:1 – 66:9	
Defendant	75:5 – 76:2	<u>Counter-designations.</u> Lacey, 52:10-53:3.
Defendant	78:5 – 79:2	<u>Counter-designations.</u> See above.
Defendant	79:14 – 79:18	<u>Counter-designations.</u> See above.
Defendant	80:1 – 80:12	<u>Counter-designations.</u> See above.

7. **Randall Mastrangelo**

Offering Party	Designation Range	Objection/Counter Designation
		<u>Objections.</u> Fed. R. Evid. 801. Witness is not unavailable as defined by Fed. R. Evid. 804(a).
Defendant	June 29, 2005 Deposition: 20:15 – 21:3	
Defendant	25:5 – 26:9	

Offering Party	Designation Range	Objection/Counter Designation
Defendant	31:22 – 32:20	<u>Objections.</u> The document speaks for itself.  <u>Counter-designations.</u> 31:21-33:3.
Defendant	44:20 – 45:7	<u>Objections.</u> The document speaks for itself.
Defendant	94:22 – 95:22	
Defendant	97:11 – 97:17	
Defendant	165:18 – 167:11	<u>Objections.</u> Hearsay within hearsay.
Defendant	168:9 – 169:6	<u>Objections.</u> Hearsay within hearsay.
Defendant	170:1 – 171:8	
Defendant	228:1 – 230:7	
Defendant	231:6 – 232:12	<u>Objections.</u> Fed. R. Evid. 602 – lack of personal knowledge.
Defendant	235:9 – 237:5	<u>Objections.</u> Fed. R. Evid. 602 – lack of personal knowledge.
Defendant	237:16 – 238:5	<u>Objections.</u> Fed. R. Evid. 602 – lack of personal knowledge. .
Defendant	238:10 – 239:4	<u>Objections.</u> Fed. R. Evid. 602 – lack of personal knowledge.
Defendant	263:16 – 264:6	

**8. Alan J. Milbauer**

Offering Party	Designation Range	Objection/Counter Designation
Defendant	October 27, 2004 Deposition: 21:16 – 25:2	
Defendant	36:5 – 43:10	<u>Objections.</u> Fed. R. Evid. 801.
Defendant	78:22 – 79:11	<u>Objections.</u> Fed. R. Evid. 402 – lack of personal knowledge.
Defendant	103:16 – 107:18	
Defendant	110:11 – 111:20	
Defendant	137:11 – 139:8	<u>Objections.</u> Fed. R. Evid. 403 – waste of time, undue burden.
Defendant	142:12 – 143:15	
Defendant	149:19 – 152:14	

**9. Keith Patterson**

Offering Party	Designation Range	Objection/Counter Designation
		<u>Objections.</u> Fed. R. Evid. 801. Witness is not unavailable as defined by Fed. R. Evid. 804(a).
Defendant	June 28, 2005 Deposition: 42:8 – 44:2	
Defendant	52:15 – 53:22	
Defendant	111:19 – 121:16	
Defendant	128:13 – 128:19	
Defendant	132:16 – 133:12	<u>Objections.</u> Fed. R. Evid.

		602 – lack of knowledge.
Defendant	144:16 – 144:19	
Defendant	149:9 – 150:1	<u>Counter-designations.</u> 150:2-9
Defendant	200:6 – 204:18	

DATED: October 24, 2006.

Respectfully submitted,

By /s/ Steve W. Berman

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**CERTIFICATE OF SERVICE BY LEXISNEXIS FILE & SERVE**

Docket No. MDL 1456

I, Steve W. Berman, hereby certify that I am one of plaintiffs' attorneys and that, on October 24, 2006, I caused copies of **PLAINTIFFS' OBJECTIONS TO ASTRAZENECA PHARMACEUTICALS LP'S DEPOSITION DESIGNATIONS** to be served on all counsel of record by causing same to be posted electronically via Lexis-Nexis File & Serve and hard copy of the highlighted deposition transcripts of plaintiffs' counter-designations to be served by overnight mail to the following Defendants:

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